

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

MICHAEL DONOGHUE and PREMIUM
MORTGAGE CORPORATION,

Plaintiffs,

-vs-

20-cv-06100

CYNTHIA NOSTRO, DYLAN RANDALL,
DAVID POPHAM, and EVERETT FINANCIAL, INC.
d/b/a SUPREME LENDING,

Defendants.

NOTICE OF MOTION

MOTION BY:

Michael Rothenberg, Esq.
David Rothenberg, Esq.
ROTHENBERG LAW
Attorneys for non-party Jackie Ruotsi

DATE, TIME & PLACE:

To Be Set by the Court

The Honorable Mark W. Pedersen
United States Magistrate Judge
U.S. Courthouse, 100 State Street
Rochester, New York 14614

SUPPORTING PAPERS:

Declaration of Michael Rothenberg, Esq., sworn to May 20, 2022, and Exhibit A annexed thereto; Declaration of nonparty Jackie Ruotsi, sworn to May 20, 2022; and Memorandum of Law in Support of Motion to Quash.

RELIEF REQUESTED AND GROUNDS:

An order pursuant to F.R.C.P. 45:

A) Quashing the subpoena issued by defendant Everett Financial, Inc. d/b/a Supreme Lending to nonparty Jackie Ruotsi; and

B) granting plaintiff such other and further relief as to the Court deems just, proper, and equitable.

LOCAL RULE 7(a)(1):

Non-party Jackie Ruotsi reserves the right to file reply papers.

**ORAL ARGUMENT
IS REQUESTED.**

Dated: May 20, 2022
Rochester, NY

s/Michael Rothenberg
Michael Rothenberg, Esq.
David Rothenberg, Esq.
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To: All counsel of record by CM/ECF